

ERIC T. SANDERS  
 Alaska Bar No. 7510085  
 FELDMAN ORLANSKY & SANDERS  
 500 L Street, Suite 400  
 Anchorage, Alaska 99501  
 Telephone: (907) 272-3538  
 Facsimile: (907) 274-0819  
 Email: [sanders@frozenlaw.com](mailto:sanders@frozenlaw.com)

Attorneys for Plaintiffs  
 Harbor Enterprises, Inc., and North 60 Petro Ltd.

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF ALASKA AT ANCHORAGE**

HARBOR ENTERPRISES, INC., and	)	Case No. 3:01-cv-00029-HRH
NORTH 60 PETRO LTD.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	
	)	
WPT HOLDINGS LIMITED, f/k/a WHITE	)	
PASS TRANSPORTATION LIMITED, and	)	
RUSSELL METALS, INC., f/k/a FEDERAL	)	
INDUSTRIES, LTD.,	)	
	)	<b>MOTION TO EXTEND STAY</b>
Defendants/Third Party Plaintiffs,	)	
	)	
vs.	)	
	)	
UNITED STATES OF AMERICA,	)	
UNITED STATES ARMY, CHEVRON	)	
CORP., and STANDARD OIL COMPANY	)	
OF CALIFORNIA,	)	
	)	
Third Party Defendants.	)	
	)	

---

In September 2003, the Court granted a stay of these proceedings “to allow for the completion of the ongoing environmental assessment of the subject property and a determination of a method of remediation/risk management that will be acceptable to the Canadian environmental authorities.” During the past four and a half years the environmental assessment of the property has been diligently pursued under the Interim Remediation Plan Lost Sharing Agreement.

At the present time the detailed site assessment is in the hands of the Canadian environmental authorities. The plaintiffs cannot predict whether the Canadian authorities will approve a remediation plan this year, but it is certainly possible. Accordingly, the plaintiffs move for a stay of these proceedings until March 31, 2009.

Dated this 28th day of March, 2008.

By /s/ Eric T. Sanders

FELDMAN ORLANSKY & SANDERS  
500 L Street, Suite 400  
Anchorage, Alaska 99501  
Telephone: (907) 272-3538  
Facsimile: (907) 274-0819  
Email: [sanders@frozenlaw.com](mailto:sanders@frozenlaw.com)  
[Alaska Bar No. 7510085]

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 28<sup>th</sup> day of March 2008,  
a copy of the foregoing **Motion to Extend Stay**  
was electronically served on:

William M. Bankston  
Bankston Gronning O'Hara P.C.

Richard L. Pomeroy  
U.S. Attorney's Office

Robert C. Bundy  
Dorsey & Whitney

Stephen M. Ellis  
Delaney, Wiles et al.

By: /s/ Eric T. Sanders